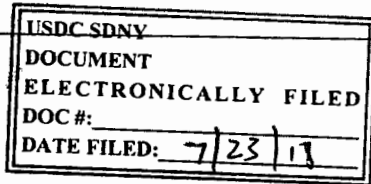




U.S. Department of Justice

United States Attorney
Southern District of New York



The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 20, 2018

BY EMAIL

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Gregg Schonhorn,
16 Cr. 828 (PGG)

Your Honors:

The Government respectfully submits this letter in accordance with the Court's procedure regarding the sentencing of defendants in factually-related cases that are pending before different judges.

In December 2016, defendant Gregg Schonhorn pled guilty, pursuant to a cooperation agreement, before Judge Gardephe. *See United States v. Schonhorn*, 16 Cr. 838 (PGG). Schonhorn's primary cooperation has involved the prosecution of two defendants, Navnoor Kang and Deborah Kelley, both of whom pled guilty before and have been sentenced by Judge Oetken for their roles in a pay-to-play bribery scheme involving the New York State Common Retirement Fund. *See United States v. Navnoor Kang & Deborah Kelley*, 16 Cr. 837 (JPO).

Judge Gardephe has scheduled a control date for November 14, 2018 at 3:00 p.m. in Schonhorn's case, and the parties are prepared for Schonhorn to proceed to sentencing on that date. If Schonhorn's case is transferred to Judge Oetken, the parties would request a sentencing date in November 2018. The Government also requests that the Court that ultimately sentences Schonhorn direct the Probation Department to prepare a presentence investigation report (PSR) for Schonhorn.

MEMO ENDORSE

This case will remain with this Court, and sentencing will proceed on November 14, 2018 at 3:00 p.m. The Probation Department is directed to prepare a pre-sentence report.

SO ORDERED:

Paul G. Gardephe

Paul G. Gardephe, U.S.D.J.

July 23, 2018

If Court has any questions, the Government is, of course, available.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: Sam Braverman, Esq.